IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

ROTHSCHILD DIGITAL)
CONFIRMATION, LLC,)
Plaintiff,))
V.) C.A. No. 19-1109-MN
COMPANYCAM, INC.,)
Defendant.)

DEFENDANT COMPANYCAM, INC.'S MOTION TO DISMISS

Defendant CompanyCam, Inc. respectfully moves the Court to dismiss the complaint pursuant to Federal Rule of Civil Procedure 12(b) as the claims of the Asserted Patent are not patent eligible under 35 U.S.C. § 101. The grounds for this motion are fully set forth in Defendant's opening brief filed concurrently herewith.

/s/ Karen E. Keller

Karen E. Keller (No. 4489) David M. Fry (No. 5486) Nathan R. Hoeschen (No. 6232)

SHAW KELLER LLP I.M. Pei Building

1105 North Market Street, 12th Floor

Wilmington, DE 19801

(302) 298-0700

kkeller@shawkeller.com dfry@shawkeller.com nhoeschen@shawkeller.com

Attorneys for Defendant

OF COUNSEL: Rachael Lamkin LAMKIN IP DEFENSE 100 Pine Street, Suite 1250 San Francisco, CA 94111 (916) 747-6091

Dated: August 19, 2019